

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE: :  
ANTOINETTE M. BARNES : 5-21-01411-MJC  
: :  
DEBTOR(S) : CHAPTER 7  
.....

**OBJECTION OF JOHN J. MARTIN, ESQUIRE AND THE LAW OFFICES OF  
JOHN J. MARTIN TO DEBTOR'S CHAPTER 13 PLAN**

**AND NOW COMES**, John J. Martin, Esquire and the Law Offices of John J. Martin (collectively referred to as “Objector”) and files this Objection to the Debtor’s Chapter 13 Plan as follows:

1. The above case was commenced by the filing of a Petition for Relief under Chapter 7 of the United States Bankruptcy Code (“Code”) on or about June 23, 2021. John J. Martin was appointed Chapter 7 Trustee in the case (“Trustee”).
2. That Objector were approved as counsel to the Trustee based upon the Trustee’s Application to Employ General Counsel on behalf of the Trustee and bankruptcy estate.
3. That over the objection of the Trustee, the Debtor’s Motion to Voluntarily Convert Case From Chapter 7 to Chapter 13 was granted.
4. That Objector filed a First Interim Application For Compensation and Reimbursement of Expenses seeking compensation in the amount of \$5,520.00 and this Honorable Court entered an order on or about November 23, 2021 approving said application for compensation and awarded Objector compensation in the amount of \$5,520.00.
5. That the amount due John J. Martin, Esquire and the Law Firm of John J. Martin is a chapter 7 administrative claim and is evidenced by Claim #8 in the Debtor’s bankruptcy case.

6. That the Debtor's Chapter 13 Plan fails to provide for the payment of allowed chapter  
7 administrative claim of John J. Martin, Esquire and the Law Firm of John J. Martin.

**WHEREFORE**, your Objector, John J. Martin, Esquire and the Law Firm of John J. Martin,  
respectfully request this Honorable Court to sustain the Objection to Debtor's Chapter 13  
Plan and for such other and further relief as the Court deems just and proper.

Dated: January 11, 2022

Respectfully submitted,

/s/ John J. Martin, Esquire  
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